

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

Inquiry Regarding Carrier Current Systems,)
Including Broadband Over Powerlines)

FCC Docket No. 03-104

REPLY COMMENTS OF
THE AMHERST ALLIANCE

THE AMHERST ALLIANCE is a Net-based, nationwide advocacy group, founded in Amherst, Massachusetts on September 17, 1998. Originally established to support the creation of a Low Power FM Radio Service, Amherst has since expanded its agenda to include advocacy of other media reforms *and* resistance to “spectrum grabs” that would reduce opportunities for individual broadcasters and/or community groups.

In keeping with the latter objective, THE AMHERST ALLIANCE hereby submits Reply Comments in FCC Docket 03-104, which concerns the possible authorization of Broadband Over Powerlines (BPL). These Reply Comments supplement previously filed Written Comments in the same Docket.

Amherst strongly seconds the concerns which have already been expressed in Written Comments by THE AMERICAN ACADEMY OF SCIENCES’ COMMITTEE ON RADIO FREQUENCIES ... THE NORTH AMERICAN SHORTWAVE ASSOCIATION ... THE AMERICAN RADIO RELAY LEAGUE ... and a small army of individual Amateur Radio Service operators. Among others.

We regard as *fact*, not speculation, the huge waves of radio interference that widespread use of BPL will create for existing uses of the affected frequencies. These existing uses include Amateur Radio Service transmissions ... interconnected *military* uses, conducted through the Military Affiliate Radio System (MARS) ... Citizens' Band transmissions ... shortwave listeners and broadcasters ... and radio astronomers, both amateur and professional.

Any and all of these five existing uses clearly have a greater value to society than the marginal increases in convenience offered by BPL.

We are, therefore, not surprised at all that BPL has already been rejected, on grounds of inevitable interference with higher priority frequency uses, by the governments of both The Netherlands and Japan.

Given (1) the body of scientific evidence regarding the interference that BPL will generate, (2) the high social value of the existing frequency uses that would be compromised or even displaced by BPL, and (3) the record of rejection of BPL by two other industrialized nations, the rejection of BPL by the FCC is clearly justified.

Respectfully submitted,

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